

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, MARIA NGUYEN,  
WILLIAM BYATT, JEREMY DAVIS, and  
CHRISTOPHER CASTILLO, individually  
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK

**DECLARATION OF DAVID  
CROSSLAND**

Judge: Honorable Lucy H. Koh

1 I, David Crossland, declare as follows:

2 1. I am a Program Manager at Google and I am one of the leads on the Google Fonts team. I have  
3 worked with the Google Fonts team since 2010, initially as an independent consultant, and as a  
4 Google employee since 2016. My current responsibilities include program management and  
5 operations for the Google Fonts application programming interface (“Fonts API”). I submit this  
6 declaration to clarify some misconceptions about the data being sent to certain Google servers as a  
7 result of the Court’s use of the Fonts API.

8 2. Google Fonts API is a free web service that supports high-quality open source font files that  
9 are used by website owners to improve the appearance of their sites with richer, non-standard  
10 typefaces, emoji and icons. Website owners often choose to use the Fonts API instead of other ways to  
11 use font files on their websites because it is perceived as faster and easier than other free alternatives.  
12 All use of the Fonts API is governed by its Terms of Service, available at  
13 <https://developers.google.com/fonts/terms>, and which incorporate the API Terms of Service, available  
14 at <https://developers.google.com/terms>.

15 3. When a user visits a web page, their browser connects to the website’s server and retrieves an  
16 HTML document, which often contains links to download additional media such as images, graphics,  
17 videos, audio files, and fonts, which are combined to render a visual and interactive page. These  
18 additional media may be located on the same server that hosts the website, or a server belonging to a  
19 third-party entity that provides services to the website.

20 4. To use the Fonts API, website owners install links on their website that cause the user’s  
21 browser to call the servers involved in providing the Fonts service: fonts.googleapis.com and  
22 fonts.gstatic.com. These links may be viewed by any Chrome user by visiting the Court’s webpage  
23 and clicking on “View,” “Developer,” “Developer Tools,” “Sources.”

24 5. When a user visits the Court’s website, the Fonts API links in the website’s source code cause  
25 the user’s browser to connect with fonts.googleapis.com. The user’s browser then receives a list of  
26 links to font files, which are hosted on the fonts.gstatic.com server. This process occurs irrespective  
27 of the brand of browser being used.

